

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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ARIE GINGER and ORLY GINGER, in her individual
capacity and on behalf of the Orly Genger 1993 Trust,
Plaintiff

v.
SAGI GINGER et al,

Defendants

INDEX No 651089/2010
IAS Part 12 (Jaffe, JSC)

AFFIDAVIT OF
DALIA GINGER, TRUSTEE

-----X
STATE OF NEW YORK)
COUNTY OF NEW YORK)ss.:

E-FILED CASE

DALIA GINGER, being duly sworn, deposes and says:

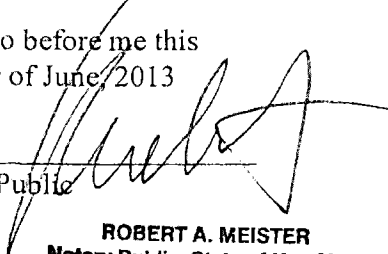
1 I was a Defendant in this action, but all claims against me were dismissed. I am also the Trustee of the Orly Genger 1993 Trust, although I was not sued herein that capacity. I have filed an appeal to the Appellate Division from the Amended Judgment because it improperly added injunctive relief against me in that capacity, and I have filed a motion with the Appellate Division for a stay of that part of the Amended Judgment pending appeal. Also, Plaintiffs have both appealed the Judgment dismissing the claims against me.

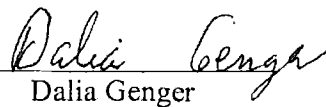
2 I was informed that Plaintiff Orly Genger has reached a settlement with the Trump Group of Defendants, but neither her counsel nor counsel for the Trump Defendants will disclose to my counsel the terms of that settlement. Although her complaint in this action states that she asserts claims both individually and on behalf of the Orly Trust, an analysis of the claims shows that they are entirely claims of the Orly Trust and that she has no individual rights separate therefrom.

3 Therefore, to the extent that she is receiving consideration for dismissing claims against the Trump Group, she is converting assets belonging to the Orly Trust, and this Court ought not allow that.

Sworn to before me this
26th day of June, 2013

Notary Public


ROBERT A. MEISTER
Notary Public, State of New York
No. 31-02ME2653350
Qualified in New York County
Commission Expires March 30, 2015


Dalia Genger